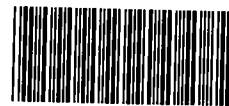


ORIGINAL



SDMS DocID

2228533

EXHIBIT F

TO: AREA SUPERVISORS
J.R. MARSHALL
O. FERNANDEZ
R.J. SULLIVAN

FROM: C.J. MULLEN

DATE: 8/26/87

PROCEDURE FOR THE HANDLING, DECONTAMINATION, STORAGE
AND DISPOSAL OF EMPTY DRUMS

I. PURPOSE

The purpose of this procedure is to establish guidelines for operating areas on the handling, decontamination, storage and disposal of empty drums. The objective is to protect employees and contractor personnel who handle these containers, and also to insure compliance with environmental regulations.

II. DEFINITION OF AN EMPTY DRUM

- 1) A drum that has been drained and contains less than 1 inch of material.
- 2) A drum which has been rinsed as required by this procedure.

III. PROCEDURE

A. DECONTAMINATION

This procedure applies to drums which last contained raw materials, intermediates, finished products and waste materials.

1. Empty drums can be sent directly to a drum reconditioner/dispenser.
2. Certain drums require triple rinsing.
 - a) Drums which last contained material listed on the EPA "P LIST" (See Appendix A) fall into this category.
 - b) Drums which last contained materials that are potential hazards (See Appendix B) fall into this category.
 - c) The materials on this plant which fall into this category can be found in Appendix C.
3. Any drum, including hazardous waste drums, which last contained a material which requires rinsing must also be triple rinsed.

B. LABELLING

1. Empty drums do not require a special label.
2. Empty hazardous waste drums on the Imaging side require a waste label (See Appendix D).
3. The only identification on an empty drum should be the material last contained and "empty". Other markings must be blocked out.

C. STORAGE

1. Empty drums can be stored in designated locations in operating areas. The following storage conditions apply:
 - a) Drums must be labelled correctly.
 - b) Drums must be sealed.
 - c) Drums must not be leaking.

D. DISPOSAL

1. Only M & L recommended drum reconditioners/disposers should be used.
2. Contact the site environmental coordinator for questions about this procedure.

APPENDIX A

"P LIST" CHEMICALS THAT REQUIRE TRIPLE RINSING

§ 261.32 Hazardous waste from specific sources. — Continued.

Industry and EPA hazardous waste No.	Hazardous waste	Hazard code
K054	Chrome (blue) shavings generated by the following subcategories of the leather tanning and finishing industry: hair pulp/chrome tan/retan/wet finish; hair save/chrome tan/retan/wet finish; no beamhouse; through-the-blue; and shoeing.	(F)
K055	Buffing dust generated by the following subcategories of the leather tanning and finishing industry: hair pulp/chrome tan/retan/wet finish; hair save/chrome tan/retan/wet finish; no beamhouse; and through-the-blue.	(F)
K056	Sevier scrapings generated by the following subcategories of the leather tanning and finishing industry: hair pulp/chrome tan/retan/wet finish; hair save/chrome tan/retan/wet finish; no beamhouse; through-the-blue; and shoeing.	(F)
K057	Wastewater treatment sludge generated by the following subcategories of the leather tanning and finishing industry: hair pulp/chrome tan/retan/wet finish; hair save/chrome tan/retan/wet finish; no beamhouse; through-the-blue; and shoeing.	(F)
K058	Wastewater treatment sludge generated by the following subcategories of the leather tanning and finishing industry: hair pulp/chrome tan/retan/wet finish; hair save/chrome tan/retan/wet finish; and through-the-blue.	(F, T)
K059	Wastewater treatment sludge generated by the following subcategory of the leather tanning and finishing industry: hair save/non-chrome tan/retan/wet finish.	(R)
Iron and Steel		
K060	Ammonia still line sludge from coking operations.	(M)
K061	Emission control dust/sludge from the electric furnace production of steel.	(M)
K062	Spirit pickle liquor from steel finishing operations.	(C, T)
K063	Sludge from time treatment of spent pickle liquor from steel finishing operations.	(M)
Primary Copper, K064	Acid plant blowdown slurry/sludge resulting from the thickening of blowdown slurry from primary copper production.	(T)
Primary Lead, K065	Surface impoundment solids contained in and dredged from surface impoundments at primary lead smelting facilities.	(M)
Primary Zinc		
K066	Sludge from treatment of process wastewater and/or acid plant blowdown from primary zinc production.	(M)
K067	Electrolytic anode slimes/sludges from primary zinc production.	(M)
K068	Cadmium plant leach residue (iron oxide) from primary zinc production.	(M)
Secondary Lead, K069	Emission control dust/sludge from secondary lead smelting.	(M)

§ 261.33 Discarded Commercial Chemical Products, Off-Specification Species, Containers, and Spill Residues Thereof.

The following materials or items are hazardous wastes if and when they are discarded or intended to be discarded:

(a) Any commercial chemical product, or manufacturing chemical intermediate having the generic name listed in paragraph (e) or (f) of this section.

(b) Any off-specification commercial chemical product or manufacturing chemical intermediate which, if it met specifications, would have the generic name listed in paragraphs (e) or (f) of this section.

(c) Any container or inner liner removed from a container that has been used to hold any commercial chemical product or manufacturing chemical intermediate having the generic name listed in paragraph (e) of this section, unless:

(1) The container or inner liner has been triple rinsed using a solvent capable of removing the commercial chemical product or manufacturing chemical intermediate;

(2) The container or inner liner has been cleaned by another method that has been shown in the scientific literature, or by tests conducted by the generator, to achieve equivalent removal; or

(3) In the case of a container, the inner liner that prevented contact of the commercial chemical product or manufacturing chemical intermediate with the container, has been removed.

(d) Any residue or contaminated soil, water or other debris resulting from the cleanup of a spill, into or on any land or water, of any commercial chemical product or manufacturing chemical

intermediate having the generic name listed in paragraphs (e) or (f) of this section.

[Comment: The phrase, "commercial chemical product or manufacturing chemical intermediate having the generic name listed in..." refers to a chemical substance which is manufactured or formulated for commercial or manufacturing use. It does not refer to a material, such as a manufacturing process waste, that contains any of the substances listed in paragraphs (e) or (f). Where a manufacturing process waste is deemed to be a hazardous waste because it contains a substance listed in paragraphs (e) or (f), such waste will be listed in either §§ 261.31 or 261.32 or will be identified as a hazardous waste by the characteristics set forth in Subpart C of this Part.]

(e) The commercial chemical products or manufacturing chemical intermediates, referred to in paragraphs (a) through (d) of this section, are identified as acute hazardous wastes (H) and are subject to the small quantity exclusion defined in § 261.5(c). These wastes and their corresponding EPA Hazardous Waste Numbers are:

Hazardous waste No.	Substance
1060 see P058	
1081 see P057	
(Acetyl)phenylmercury see P092	
Acetone cyanohydrin see P069	
P001	3-(alpha-Acetylbenzyl)-4-hydroxycoumarin and salts
P002	1-Acetyl-2-thiouracil
P003	Acrolein
	Agaric see P007
	Agrosan GN 6 see P092
	Aldicarb see P069
	Aldrin see P048
P004	Alar
P005	Allyl alcohol
P006	Aluminum phosphide (R)
	ALVIT see P037
P007	Ammonothiophene see P054
P008	5-(Aminomethyl)-3-isoxazolol
	4-Aminopyridine
	Ammonium metavanadate see P119
P009	Ammonium persulfate (R)
	ANTIMUCIN WDR see P092
	ANTURAT see P073
	AQUATHOL see P058
	ARETIT see P020
P010	Arsenic acid
P011	Arsenic pentoxide
P012	Arsenic trioxide
	Atracurium see P001
	AVITROL see P008
	Azidothionamide see P054
	AZOFOS see P061
	Azophos see P081
	BAITU see P072
P013	Barium cyanide
	BASENITE see P020
	BCHIE see P016
P014	Benzonitrile
	Benzophenone see P050
P015	Beryllium dust
P016	Bis(chloromethyl) ether
	BLADAN-M see P071
P017	Bromobutane
P018	Brodine
P019	2-Butanone peroxide
	BUFEN see P092
P020	Butaphene see P020
P021	2-sec-Butyl-4,6-dinitrophenol
	Calcium cyanide
	CALDON see P020
P022	Carbon disulfide
	CERESAN see P092
	CHEMEX UNIVERSAL see P092
	CHEMEX GENERAL see P020
	CHEMEX P.E. see P020
	CHLOR-70X
P023	Chlorobenzaldehyde
P024	p-Chloroaniline
P025	1-(p-Chlorobenzyl)-5-methoxy-2-methylindole-3-acetic acid
P026	1-(o-Chlorophenyl)thiourea
P027	3-Chloropropionitrile
P028	alpha-Chloroalkenes
P029	Copper cyanide
	CNETOX see P106
	Coumatin see P001
	Coumatol see P001
P030	Cyanides

Continued

(A, D)
(A)
(M)
(M)
(C, D)
(M)
(M)
(M)
(M)
(M)
(M)
(M)

9119

P092

2. *polyvinylidene fluoride*

The Agency included those trade names of which it was aware; an omission of a trade name does not imply that the omitted material is not hazardous. The material is hazardous if it is listed under its generic name.

APPENDIX B

POTENTIALLY HAZARDOUS MATERIALS THAT REQUIRE TRIPLE RINSING

ACETALDEHYDE
ACRYLONITRILE
p-AMINOAZOBENZENE
2-AMINODIPHENYL
3-AMINO-1,2,4 TRIAZOLE
AMMONIUM BICHROMATE
ANILINE
o-ANISIDINE
ANTIMONY TRIOXIDE
ASBESTOS
ATRAZINE
BENOMYL
BENZENE
BENZYL CHLORIDE
BENZYL CHLORIDE RESIDUE (BCR)
BROMACIL
1,3-BUTADIENE
p-tert-BUTYL-BENZOIC ACID
t-BUTYL ISOCYANIDE
CARBON TETRACHLORIDE
CHLORODIFLUOROMETHANE
CHLOROFORM
CHROMIC ACID
CHROMIUM DIOXIDE
o-DIANISIDINE
DI(n-BUTYL)PHTHALATE
1,4-DICHLOROBUTENE-2
DI(2-ETHYLHEXYL)PHTHALATE
DIMETHYLCARBAMOYL CHLORIDE
1,1-DIMETHYL-HYDRAZINE

DIMETHYL SULFATE
DIMETHYLSULFOXIDE (DMSO)
2,4-DINITROTOLUENE
1,4-DIOXANE
DIURON
EPICHLOROHYDRIN
1,2-EPOXY-3-PHENOXY-PROPANE
EPOXY RESINS
2-ETHOXYETHANOL
2-ETHOXYETHYLACETATE
ETHYLENE DIBROMIDE
ETHYLENE OXIDE
ETHYLENETHIOUREA
2-ETHYLHEXYL ACRYLATE
FORMALDEHYDE
FORMAMIDE

HEXAFLUOROACETONE
HEXAMETHYLPHOSPHORAMIDE
HYDRAZINE
N-(2-HYDROXYETHYL)ETHYLENEIMINE
INH-6573
INL-5300
INY-6202
KEVLAR
LEAD (INORGANIC COMPOUNDS)
LEAD (ORGANIC COMPOUNDS)
LEAD CHROMATE
LINURON
LITHIUM COMPOUNDS
2-METHOXYETHYLACETATE
2-METHOXYETHANOL
MBC
METHYL CHLORIDE
4,4-METHYLENE bis-(2-CHLOROANILINE)
METHYLENE CHLORIDE
4,4-METHYLENEDIANILINE
MONOMETHYLFORMAMIDE
NER-010A EPOXY RESIN
5-NITRO-o-ANISIDINE
2-NITRONAPHTHALENE
N-NITROSODIPHENYLAMINE
OXYDIANILINE
beta-PROPIOLACTONE
PROPYLENEIMINE
PROPYLTHIOURACIL
REFRACTORY ALUMINUM SILICATE CER-
AMIC FIBERS
SODIUM DICHROMATE
TETRACHLOROETHYLENE
TETRAMETHYLTHIOUREA
TETRAMETHYLUREA
THIOACETAMIDE
THIOUREA
TITANIUM DIOXIDE
TITANIUM TETRACHLORIDE
2,4-TOLUENEDIAMINE
ortho-TOLUIDINE
2,3,4-TRICHLOROBUTENE
TRICHLOROETHYLENE
TRIFLUOROETHANOL
VINYLIDENE CHLORIDE
2,6-XYLIDINE
ZINC CHROMATE

APPENDIX C

MATERIALS ON THIS PLANT WHICH REQUIRE TRIPLE RINSING

ACRYLONITRILE
3-AMINO-1,2,4 TRIAZOLE
BENZENE
CARBON TETRACHLORIDE
DIMETHYL SULFATE
1,4-DIOXANE
ETHYLENE DIAMINE
FORMALDEHYDE
LEAD ACETATE
LEAD CYCLOHEXANEBUTYLATE
LEAD NITRATE

LITHIUM BROMIDE
LITHIUM CHLORIDE
LITHIUM CHROMATE
LITHIUM SULFATE
METHYLENE CHLORIDE
SODIUM AZIDE
SODIUM DICHROMATE
THIOACETAMIDE
THIOUREA
TITANIUM DIOXIDE
VINYLIDENE CHLORIDE

APPENDIX D


WASTE LABEL FOR EMPTY WASTE STORAGE DRUMS (IMAGING SIDE ONLY)

BEND BACK TO REMOVE

Name of material last contained. _____

NAME →

Ratings can be obtained from the Chemical
Database on the computer. The Safety
Office can provide assistance.

	FIRE	PROTECTION	
	<input type="checkbox"/>	NORMAL <input type="checkbox"/>	FACE <input type="checkbox"/>
	REACTIVITY	HARD <input type="checkbox"/>	RESP. <input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	EYE <input type="checkbox"/>	BODY <input type="checkbox"/>

DATE _____ MSDS NUMBER: _____

Area from which the material originated. _____

SOURCE OF WASTE →

Check the appropriate method.

DISPOSAL METHOD:

- _____ TO BE RECLAIMED
- _____ FOR DISPOSAL BY
- _____ OUTSIDE VENDOR
- _____ EMPTY DRUM BEING
- _____ RETURNED TO VENDOR
- _____ SPECIAL (EXPLAIN)

EMPTY DRUMS (CHECK ONE)

Check here if drum has been rinsed. (Date) _____

RINSED ☒ DATE _____ INT. _____

Check here if drum has not been rinsed. _____

NOT-RINSED ☐

Name of area supervisor responsible. _____



Date when label was completed. _____

AREA SUPERVISOR RESPONSIBLE

DATE: →

338163-001 (REV. 2/86)

WASTE CHARACTERIZATION FORM (WCF)

Date: 3/12/88

I. LOCATION: PARLIN IMAGING SYSTEMS
 EPA ID#: NJD002444024
 EPA Code: N/A

CONTRACTOR'S CODE:
 DU PONT CODE: WPL-15
 STATE CODE: C-387

II. NAME OF WASTE: PCB CONTAMINATED OIL FROM TRANSFORMERS

III. COMPOSITION

C. ONE TIME
 OR TYPICAL
 ANALYSIS

D. CONCENTRATION
 RANGE
 UPPER LOWER
 4000 7

E. EXPOSURE LIMITS
 ACGIH OSHA
 .5MG/KG .5MG/KG

A. MAJOR COMPONENTS

1. TRANSFORMER OIL CONTAINING PCB'S
- 2.
- 3.
- 4.
- 5.

B. TRACE COMPONENTS NOT LISTED ABOVE (PPM)

Ag: 0 As: 0 Ba: 0 Cd: 0 Cl: 0 CN: 0 Cr: 0
 Cu: 0 F: 0 Hg: 0 I: 0 N: 0 Ni: 0 P: 0
 Pb: 0 S: 0 Se: 0 Zn: 0

Other components:

Indicate test method: EPTOX/ TCLP

Total Metals:

F. DOES THE WASTE CONTAIN:

Sulfides NO Cyanides NO Dioxin NO
 PCBs YES Phenolics NO Listed Solvents NO
 Insecticides, pesticides, herbicides, or
 rodenticides NO
 Halogenated Organic Compounds
 1000 Mg/l NO

IV. PHY. STATE @ 25C: Solid Liquid X Sludge Liquid/solid phases X Gas
 Other: TRANSFORMER

- Is there a dusting hazard if containers are opened? NO
- Multiple phases? NO Vol. of each phase: X SOLID X LIQUID
- Can the waste be pumped? YES Poured? YES
- X Free flowing liquid layer: 100 (Volume %)
- Pressure of container: 0 PSIG
- X Separate phase water: 0 Estimated specific gravity 1.5

V. SHIPPING CONTAINERS

Bulk: -
 Drums-

MC Code:

Size
 55 GAL.

Materials
 of Construction
 STEEL

DOT Spec.
 17 E

Approx. Weight
 per Container
 450 LBS

Container
 Label Used
 HAZARDOUS SUBSTANCE NOS

Other:

85 GAL.

STEEL

OVERPACK

550 LBS.

HAZARDOUS SUBSTANCE NOS

VI. PROPERTIES-

Flash point: 432 F (closed cup) BTU/lb: 17 K Corrosive: NO OSHA Carcinogen: YES CONTAINS
 Color: AMBER pH: - Odor: YES AROMATIC
 Reactive: NO Pyrophoric: NO
 Toxic: YES CONTAINS PCB Radioactive: NO
 Shock Sensitive: NO Explosive: NO Etiological: NO
 Other:

VII. D.O.T. Shipping Name: RD HAZARDOUS SUBSTANCE, N.O.S.

D.O.T. Hazard Classification: ORN-E (CONTAINS POLYCHLORINATED BIPHENYL)

D.O.T. Placard: YES D.O.T. Label: YES

U.N. No:

N.A. Number: 9188

VIII. VOLUME- Annual:

This request:

Per shipment:

Remarks (Treatment of spill/safety suggestion/MSDS: THIS NOT A RCRA HAZARDOUS WASTE
 SECTION J: SEE WASTE CHARACTERIZATION FORM FOR CHEMICAL COMPOSITION
 AND PERCENTAGES

REVIEWED BY
 DATE REVIEWED

Prepared by O. FERNANDEZ JR.

HAZARDOUS WASTE MANIFEST REFERENCE SHEET

1982 SHIPMENTS

- 6/21/82 - Shipped to Chambers Works
Waste flammable liquid, Poisonous N.O.S. RQ
contains Toluene and Nitrobenzene, WCH-3
approx. 4675 gallons

- 9/17/82 - Shipped to Chambers Works
Waste corrosive liquid N.O.S.
contains: Trichloroethylene, RQ
Tetrachloroethylene
Methylene Chloride
Oil
Approx. 5366 gallons

- 9/21/82 - Shipped to Chambers Works
Waste flammable liquid, corrosive N.O.S.
contains: Trichloroethylene RQ
Acrylonitrile RQ
Ethyl Acrylate
Methyl Acrylate
Mineral Spirits
Acetone
Methyl Ethyl Ketone
Tetrachloroethylene (perchloroethylene)
Methylene chloride
Oil
Approx. 3750 gallons

- 10/25/82 - Shipped to Pontchartrain, LaPlace, LA
14 drums of WCH-9; Waste cellulose Acetate
8 drums of WCH-7; Filter paper

- 11/4/82 - Shipped to Chemical Waste Management
1 container of Waste Polychlorinated Biphenyls,
(Mineral Oil solution, containing >500ppm PCB's)
5 containers of Waste Polychlorinated Biphenyls (Mineral
Oil solution, containing <500ppm PCB's)

14 containers of Waste Polychlorinated Biphenyls
(Mineral Oil solution, containing <50ppm PCB's)

1 Hazardous Waste Solid N.O.S. transformer
containing >500ppm PCB contaminated oil.

1 Hazardous Waste Solid N.O.S. (articles contaminated
with PCB oil)

1 Hazardous Waste Solid N.O.S. transformer containing
<500 >50ppm PCB contaminated oil

TO: Ed Brennan
Section 313 Task Team

CC: Bob Goldner

FROM: George Osei

May 16, 1988

SECTION 313 HAZARDOUS WASTE SHIPPED IN 1987

Following is a list of chemicals and the locations they were shipped to in 1987:

FP Manufacturing Area

Chemical Name	From Sheet 1	From Sheet 2
Acetone	166277 (SolRec)	125,589 Ross
Acrylonitrile	0	1,392 Ross
Butyl Acrylate	19886 (Chambers)	408 25,536 Ross
Ethyl Acrylate	656 (Ensco)	0
Ethylene Glycol	16896 (SCA Chem)	0
MEK	7248 (SolRec)	77,679 Ross
Methanol	0	2,330 Ross
Methyl Methacrylate	0	2,164 Ross
Methylene Chloride	0	49,696 Ross
N-Butyl Alcohol	0	12,548 Ross
Toluene	140704 (SolRec)	225,379 Ross
Xylene	130308 (SolRec)	0

IMG Manufacturing Area

Chemical Name	Total(Ibs.)
Acetone	11,834 (2-CWME;7944-Rollins;3888-Chambers)
Acrylonitrile	256 (TWI)
MEK	11,432 (200-CWME;7344-Rollins;3888-Chambers)
Methanol	10,547 (4784-Rollins;5763-Chambers)
Methyl Methacrylate	1,760 (880-CWME;880-CWMN)
Methylene Chloride	2,482 (522-CWME;1960-Rollins)
N-Butyl Alcohol	10,476 (7712-Rollins;2764-Chambers)
Toluene	2,082 (792-Rollins;1122-Chambers;168-CWMN)
Vinylidene Chloride	2,600 (400-CWME;2200-CWMN)